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2	never thought about it, but either '12 or '13.
3	Q. According to the records we received
4	from the Office of the Commissioner, we can see
5	that it was 2013?
6	A. '13, there you go, there's your
7	answer.
8	Q. When the 2012 season ended, was it
9	your intention to apply for a crew chief
10	opening?
11	MS. PHILION: Object to form.
12	BY MR. MURPHY:
13	A. No.
13 14	A. No. Would you like more on the reason
14	Would you like more on the reason
14 15	Would you like more on the reason for that?
14 15 16	Would you like more on the reason for that?  Q. That was my next question.
14 15 16 17	Would you like more on the reason  for that?  Q. That was my next question.  A. Yeah, the reason being I just came
14 15 16 17 18	Would you like more on the reason  for that?  Q. That was my next question.  A. Yeah, the reason being I just came  up during a time where seniority was kind of
14 15 16 17 18	Would you like more on the reason for that?  Q. That was my next question.  A. Yeah, the reason being I just came up during a time where seniority was kind of something that was thought of in a different
14 15 16 17 18 19 20	Would you like more on the reason for that?  Q. That was my next question.  A. Yeah, the reason being I just came up during a time where seniority was kind of something that was thought of in a different way, not necessarily changed a whole lot now,
14 15 16 17 18 19 20 21	Would you like more on the reason for that?  Q. That was my next question.  A. Yeah, the reason being I just came up during a time where seniority was kind of something that was thought of in a different way, not necessarily changed a whole lot now, but it's changed. And, you know, I had always

whether it just be whatever, that if they were,

25

F. Culbreth - 7/8/19 1 2. you know, senior to me and every bit as capable, 3 I just kind of -- I just kind of was brought up in an era, you know, that things just went to 4 5 them first, if that's how you felt. And that's 6 how I felt about two or three people; namely, 7 Wally and even Angel. I think I said at the time, that, you know, they were senior to me, 8 9 and had been used. So I thought that it was, 10 you know, you know, right for them to get it, so 11 I just -- I just didn't apply initially. At that time, sir, was Alfonso 12 13 Marquez more senior than you? 14 Α. No. 15 Q. No, O.K. 16 Now, did you receive a phone call 17 from anyone hat Major League Baseball asking you to apply for the crew chief position in 2013? 18 19 Α. I did. It's kind of a two-part 20 answer here so I -- and I have to give it to you 21 this way since, again, it was a long time ago, 2.2 and, the call was so, to me at the time, 23 insignificant. 24 I can't remember if I received a

phone call from Joe West first or Randy Marsh

25

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2.

first. But the reason that's significant because as soon as I hung up with one, the other called. Again, I can't -- I can't say which one happened first; I just by the -- common sense would tell me it was possibly Randy first and then Joe second. But again, if I had to sit here and tell you for certain, can't do it.

I received a call, if it was Randy first, the only thing Randy asked me was had I put my name in for the crew chief job. And I told him no. And I explained my reasoning just the way I did a few minutes ago. And that was it. The call literally took a couple of minutes. And that's the reason it's tough for me to recall because it was a two-minute call in my life that I didn't really give that much thought to.

When I hung up, again, the order probably went this way, but I don't know for sure. It was Joe West immediately, and when I said I hung up, it couldn't have been, again, another minute or two, and the next phone call came, and it was, "Have you put in for the crew chief job?"

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2	And I said, "No." Again, explaining
3	why. And I was told, "Put your name in."
4	So, I hung up, I think I sent it in
5	by email. As a matter of fact, I'm sure I sent
6	it in by email, and just simply put, "Fieldin
7	Culbreth is officially applying for the crew
8	chief position."
9	Q. I recognize that this call was over
10	six years ago, and I also heard everything that
11	you said.
12	I want to see if anything might
13	trigger something and if it doesn't, fine.
14	A. Absolutely.
15	Q. You know, because all we want is
16	truth, that's all we want.
17	A. Absolutely, that's all you're going
18	to get.
19	Q. That's good, I appreciate that.
20	MS. PHILION: Object to the form.
21	BY MR. MURPHY:
22	Q. Did Randy in that telephone
23	conversation after you explained to him that you
24	thought other senior umpires should get job, did
25	he express any disappointment that you weren't

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F. Culbreth - 7/8/19
 1
 2
     applying?
 3
           Α.
                 No.
                 And in the phone call that you had
 4
           0.
     with Joe West, was there any conversation about
 5
 6
     the fact that it might not be good for your
 7
     career if you didn't apply?
 8
                 MS. PHILION: Object to form.
 9
                 No, I don't recall that.
           Α.
                 So both of these were fairly brief
10
           Ο.
11
     conversations?
12
                 Yeah, I would say they were both
           Α.
13
     within -- probably within a minute of one
     another and linked in topic, you know, there
14
     just wasn't much.
15
16
                 Am I correct in thinking that, based
           Q.
17
     upon what you said, you would not have applied
18
     but for those two calls?
19
                 MS. PHILION: Object to form.
20
     BY MR. MURPHY:
2.1
           Α.
                 Yes, I think so, because it -- yeah,
2.2
     it was -- that's fair to say.
23
           Q.
                 All right.
2.4
                 Now, let's see, is this your --
                 I wouldn't apply then, that's for
25
           Α.
```